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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF WYOMING**

SCOTT J. GOLDSTEIN	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 1:23-cv-00099
v.	)	
	)	
PEGGY JO LYNN WERBELOW and	)	
WILLIAM R. FIX,	)	
	)	
Defendants.	)	

**ACCEPTANCE OF SERVICE, FULL SETTLEMENT AND RELEASE, AND**  
**STIPULATION FOR ORDER DIRECTING PLAINTIFF, SCOTT J. GOLDSTEIN,**  
**PERSONAL INJURY TRUSTEE OF THE POWELL VALLEY HEALTH CARE, INC.**  
**TO DISTRIBUTE PROCEEDS AT ISSUE IN INTERPLEADER ACTION**

The parties to this action including Plaintiff Scott J. Goldstein, Personal Injury Trustee of the Powell Valley Health Care, Inc. Personal Injury Trust, by and through himself, Scott J. Goldstein (the “Trustee”), Defendant Peggi Jo Lynn Werbelow, by and through her counsel, Robert P. Schuster of Jackson, Wyoming, and Defendant William R. Fix, by and through his counsel, Kim D. Cannon of Sheridan, Wyoming, hereby acknowledge and take the following actions.

1. Defendant Peggi Jo Lynn Werbelow hereby accepts service of process of the Complaint for Interpleader and Declaratory Relief, by and through her attorney, Robert P. Schuster;

2. Defendant William R. Fix hereby accepts service of process of the Complaint for Interpleader and Declaratory Relief, by and through his attorney, Kim D. Cannon;

3. Defendants, without admitting or denying any of claims in the Complaint for Interpleader and Declaratory Relief, hereby mutually release all claims, known or unknown, that the parties may have among themselves and the Trustee seeking to make a full settlement of all claims through this general release;

4. In consideration of the mutually binding terms of this Stipulation by and among all parties, Defendant William R. Fix accepts the sum of \$100,000 by the Trustee pursuant to an Order of this Court issued on this Stipulation in full satisfaction of all claims he has to attorney's fees and costs of any nature in relation to any representation he has had of Co-Defendant Peggi Jo Lynn Werbelow;

5. In consideration of the mutually binding terms of this Stipulation by and among all parties, all parties agree that Defendant Peggi Jo Lynn Werbelow will be entitled to the other proceeds held by Plaintiff Goldstein, as the Personal Injury Trustee of the Powell Valley Health Care, Inc. Personal Injury Trust, of \$334,215.16;

6. The payments shall be made directly by the Trustee to the parties as set forth above pursuant to the accompanying Order;

7. With the payment of the sums as ordered by the Court from the Trustee to the Defendants as set forth above, all parties shall be restrained from instituting any action against the Plaintiff for recovery of any further funds from the Trustee or part thereof;

8. The parties move the Court to enter an Order upon this Stipulation.

PLAINTIFF SCOTT J. GOLDSTEIN, PERSONAL  
TRUSTEE OF THE POWELL VALLEY HEALTH  
CARE, INC. PERSONAL INJURY TRUST

Date: July 13, 2023

By: /s/ Scott J. Goldstein  
Plaintiff Scott J. Goldstein

DEFENDANT PEGGI JO LYNN WERBELOW

Date: July 13, 2023

By: /s/ Robert P. Schuster  
Robert P. Schuster  
Counsel for Defendant Peggi Jo Lynn Werbelow

DEFENDANT WILLIAM R. FIX

Date: July 13, 2023

By: /s/ Kim D. Cannon  
Kim D. Cannon  
Counsel for Defendant William R. Fix